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19 **UNITED STATES DISTRICT COURT**
20 **CENTRAL DISTRICT OF CALIFORNIA**
21 **SOUTHERN DIVISION**

22 RENO MAY, an individual;
23 ANTHONY MIRANDA, an individual;
24 ERIC HANS, an individual; GARY
25 BRENNAN, an individual; OSCAR A.
26 BARRETTO, JR., an individual;
27 ISABELLE R. BARRETTO, an
28 individual; BARRY BAHRAMI, an
individual; PETE STEPHENSON, an
individual; ANDREW HARMS, an
individual; JOSE FLORES, an
individual; DR. SHELDON HOUGH,
DDS, an individual; SECOND
AMENDMENT FOUNDATION; GUN
OWNERS OF AMERICA; GUN
OWNERS FOUNDATION; GUN
OWNERS OF CALIFORNIA, INC.;
THE LIBERAL GUN CLUB, INC.; and
CALIFORNIA RIFLE & PISTOL
ASSOCIATION, INCORPORATED,

Plaintiffs,

v.

ROBERT BONTA, in his official
capacity as Attorney General of the
State of California, and DOES 1-10,

Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**DECLARATION OF ERICH PRATT
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION**

42 U.S.C. §§ 1983 & 1988

Hearing Date: December 4, 2023
Hearing Time: 1:30 p.m.
Courtroom: 9 B
Judge: Hon. Cormac J. Carney

DECLARATION OF ERICH PRATT

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2 1. I, Erich Pratt, am the Senior Vice President of Gun Owners of America, Inc.
3 (“GOA”), and the Senior Vice President of Gun Owners Foundation (“GOF”); both
4 are Plaintiffs in the above-entitled action. I make this declaration of my own
5 personal knowledge and, if called as a witness, I could and would testify
6 competently to the truth of the matters set forth herein.

7 2. GOA is a California non-stock corporation and a not-for-profit membership
8 organization with its principal place of business in Springfield, Virginia, exempt
9 from federal income taxes under Section 501(c)(4) of the U.S. Internal Revenue
10 Code. GOA was formed in 1976 to preserve and defend the Second Amendment
11 rights of gun owners. GOA has more than 2 million members and supporters across
12 the country, including residents within this judicial district and throughout the State
13 of California.

14 3. GOF is a Virginia non-stock corporation and a not-for-profit legal defense
15 and educational foundation with its principal place of business in Springfield,
16 Virginia, exempt from federal income taxes under Section 501(c)(3) of the U.S.
17 Internal Revenue Code. GOF was formed in 1983 and is supported by gun owners
18 across the country, within this judicial district, and throughout the State of
19 California who will be irreparably harmed by the implementation and enforcement
20 of SB 2.

21 4. Many GOA and GOF members and supporters in California have valid and
22 current concealed carry weapon (“CCW”) permits, which enable them to lawfully
23 carry a concealed firearm in public so that they can defend themselves (and
24 potentially others) in the event of a life-threatening emergency situation.

25 5. Because SB 2 would prohibit GOA and GOF members and supporters in
26 California from carrying a concealed firearm in many places where they often carry
27 and are accustomed to carrying such firearms, the utility of their CCWs, and thus
28 their right to be armed for self-defense in public, will be severely infringed,

1 curtailed, and outright eliminated in many common locations.

2 6. For example, under SB 2, GOA and GOF members and supporters cannot
3 carry concealed firearms where alcohol is served for consumption on the premises.
4 Accordingly, they cannot conceal carry at restaurants they patronize on a regular
5 basis, nor in the parking area outside such establishments.

6 7. SB 2 also prohibits GOA and GOF members and supporters in California
7 from carrying concealed firearms in parks and public lands they often frequent. In
8 addition, SB 2 prohibits carry at urgent care facilities which GOA and GOF
9 members and supporters have used in the past for rapid medical attention and would
10 use in the future. And, under SB 2, carry is prohibited at financial institutions such
11 as banks that GOA and GOF members and supporters frequent.

12 8. Perhaps most significantly, under SB 2, concealed carry is prohibited at any
13 privately owned commercial establishment that does not affirmatively display
14 notice that the establishment tolerates or supports concealed carry on the premises.
15 There are many local businesses that GOA and GOF members and supporters
16 frequent that almost certainly will not bother to post such signs that are politically
17 unpopular in much of California, forcing persons either to not carry there or stop
18 patronizing these locations entirely.

19 9. These are just a few examples of how SB 2 harms the members and
20 supporters of GOA and GOF. SB 2 renders most of California off-limits and utterly
21 unnavigable to GOA and GOF members and supporters attempting to exercise their
22 enumerated constitutional right to “bear arms” as they go about their daily lives.

23 10. In other words, GOA and GOF’s members and supporters are representative
24 of those affected by SB 2’s unconstitutional mandates, which has a ubiquitous and
25 negative effect not only on gun owners across the state but also on the general
26 public, by depriving the public of a responsible, armed citizenry, which contributes
27 to “the security of a free state.”

28 11. Protection of these rights and interests advanced in this litigation is germane

1 to GOA and GOF's respective missions, which includes efforts to preserve and
2 protect the Second Amendment and the rights of Americans to keep and bear arms.
3 GOA and GOF routinely litigate cases throughout the country on behalf of their
4 members and supporters, and GOA and GOF are capable of fully and faithfully
5 representing the interests of their members and supporters without participation by
6 each such person.

7 12.Suffice it to say, GOA and GOF believe that SB 2 is abhorrent and
8 incompatible with the general right of Americans, including Californians who are
9 GOA and GOF members and supporters, to carry a firearm in public for self-
10 defense.

11 I declare under penalty of perjury that the foregoing is true and correct.
12 Executed within the United States on September 29, 2023.

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14 Erich Pratt, declarant
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CERTIFICATE OF SERVICE
IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *May, et al. v. Bonta*
Case No.: 8:23-cv-01696 CJC (ADSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

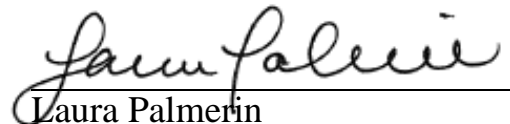
**DECLARATION OF ERICH PRATT IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY INJUNCTION**

on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Robert L. Meyerhoff, Deputy Attorney General
California Department of Justice
300 South Spring Street, Suite 1702
Los Angeles, CA 90013
Email: Robert.Meyerhoff@doj.ca.gov
Attorney for Defendant

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.


Laura Palmerin